

# INTERVENTION



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## BEFORE THE ARIZONA CORPORATION COMMISSION

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### COMMISSIONERS

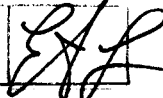
BOB STUMP, Chairman  
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BRENDA BURNS  
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SUSAN BITTER SMITH

ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

Arizona Corporation Commission  
**DOCKETED**

JUN 18 2014

**ORIGINAL**

DOCKETED BY 

IN THE MATTER OF THE APPLICATION  
OF LIBERTY UTILITIES (LITCHFIELD  
PARK WATER AND SEWER), CORP. FOR  
A CERTIFICATE OF CONVENIENCE AND  
NECESSITY TO PROVIDE WATER  
UTILITY SERVICE IN MARICOPA  
COUNTY, ARIZONA.

DOCKET NO. W-01427A-14-0134

IN THE MATTER OF THE APPLICATION  
OF LIBERTY UTILITIES (LITCHFIELD  
PARK WATER AND SEWER), CORP. FOR  
APPROVAL OF AN EXTENSION OF THEIR  
CERTIFICATE OF CONVENIENCE AND  
NECESSITY TO PROVIDE WASTEWATER  
UTILITY SERVICE IN MARICOPA  
COUNTY, ARIZONA.

DOCKET NO. SW-01428A-14-0180

**APPLICATION FOR LEAVE TO  
INTERVENE AND NOTICE OF INTENT**

Pursuant to Rule 14-3-105 of the Arizona Corporation Commission Rules of Practice and Procedure, Valley Utilities Water Company applies to intervene in the above-captioned proceeding and states the following:

1. Valley Utilities Water Company, Inc., an Arizona public service corporation ("Valley Utilities") is a public service corporation engaged in providing water utility service within unincorporated portions of Maricopa County, Arizona, pursuant to a Certificate of Convenience and Necessity granted by the Arizona Corporation Commission ("Commission").

2. On April 17, 2014, Liberty Utilities (Litchfield Water and Sewer) Corp. ("Liberty Utilities") filed an Application for Extension of Certificate of Convenience and Necessity in order

1 to serve Marbella Ranch, an approximately 365-acre property located on the El Mirage Road  
2 alignment between Glendale Avenue and Northern Avenue.

3 3. Within 30 days of this filing, Valley Utilities intends to file a competing  
4 Application for Extension of Certificate of Convenience and Necessity to serve Marbella Ranch  
5 ("Competing Application").

6 4. Marbella Ranch is contiguous on three sides (east, south and west) to Valley  
7 Utilities and Liberty Utilities is at the southeast corner only.

8 5. Upon the filing of its Competing Application, Valley Utilities intends to file a  
9 Motion to Consolidate the two dockets.

10 6. Given its intent to file a Competing Application, Valley Utilities will be directly  
11 and substantially affected by the issues raised and the decisions made in this docket because  
12 Marbella Ranch is the property which both Liberty Utilities and Valley Utilities seek to serve.

13 7. Valley Utilities respectfully requests that its application to intervene be granted at  
14 this time because given Valley Utilities' intent to file a Competing Application, Valley Utilities'  
15 participation in this proceeding will not unduly burden the nature or scope of this proceeding and  
16 will not delay the proceedings.

17 8. If Valley Utilities is granted intervention, communications regarding this matter  
18 should be addressed to the following persons:

19  
20 Robert J. Metli  
Munger Chadwick, P.L.C.  
2398 E. Camelback Road, Suite 240  
21 Phoenix, Arizona 85016  
(602) 358-7348  
22 [rjmetli@mungerchadwick.com](mailto:rjmetli@mungerchadwick.com)

Robert L. Prince  
Valley Utilities Water Company  
6808 N. Dysart Road, Suite 112  
Glendale, Arizona 85307  
(623) 935-1100  
[ValleyUtilities@vuwco.com](mailto:ValleyUtilities@vuwco.com)

23 WHEREFORE, Valley Utilities respectfully requests that the Commission issue an Order  
24 granting Valley Utilities Water Company intervention in the above-captioned proceeding.  
25  
26

RESPECTFULLY SUBMITTED this 18<sup>th</sup> day of June, 2014.

**MUNGER CHADWICK, P.L.C.**

**Robert J. Metli**  
2398 E. Camelback Road, Suite 240  
Phoenix, Arizona 85016  
Attorneys for Intervenor Valley Utilities  
Water Company

**Original + 13 copies of the foregoing  
filed this 18<sup>th</sup> day of June, 2014, with:**

**Docket Control**  
**ARIZONA CORPORATION COMMISSION**  
**1200 West Washington Street**  
**Phoenix, Arizona 85007**

Copies of the foregoing hand-delivered/emailed  
this 18<sup>th</sup> day of June, 2014, to:

**Sasha Paternoster  
Administrative Law Judge  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007**

**Janice Alward, Chief Counsel  
Legal Division  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007**

**Steven M. Olea, Director**  
**Utilities Division**  
**ARIZONA CORPORATION COMMISSION**  
**1200 West Washington Street**  
**Phoenix, Arizona 85007**

**Patrick J. Black**  
**FENNEMORE CRAIG, P.C.**  
**2394 E. Camelback Road, Suite 600**  
**Phoenix, Arizona 85016**  
**Attorneys for Liberty Utilities (Litchfield Park Water and Sewer), Corp.**